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August 20, 2024

**Via ECF**

Hon. Jennifer L. Rochon, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 20B  
New York, New York 10007

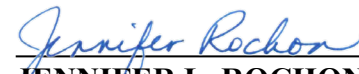
The requests are GRANTED. The initial pre-trial conference is adjourned from August 28, 2024 to September 4, 2024 at 10:30 a.m. The parties need not submit another joint letter and proposed case management plan.

**SO ORDERED.**

Dated: August 21, 2024

New York, New York

Re: **Flintlock Construction Services, LLC.,  
v. Travelers Indemnity Company et al.,  
Case No. 24-cv- 05114 (JLR)**

  
**JENNIFER L. ROCHON**  
United States District Judge

**Letter-Motion Requesting Adjournment of Pre-Trial Conference**

Your Honor:

We represent Plaintiff Flintlock Construction Services, LLC., ("Flintlock") in the above-referenced case. I am writing to request that: (a) the Initial Pretrial Conference scheduled for August 28, 2024, be adjourned to September 4, 10 or 19, 2024; and (b) the Court accept the parties' Joint Letter dated August 16, 2024 and the proposed Civil Case Management Plan and Scheduling Order which were filed today.

I am currently scheduled to attend a Certification Conference before the Hon. Kathy D. Bergmann, J.S.C. in Riverhead, New York on the morning of August 28, 2024, in the action titled "*Bessie Fain v. Larry B. Hollander et al.*" (Supreme Court of the State of New York, Suffolk County, Index No. 617661/2020). That matter, which was scheduled months ago, directly conflicts with the scheduling of the Initial Pretrial Conference in the instant action.

I have communicated with Lisa Szczepanski, Esq., the attorney for defendants, and she has no objection to this request.

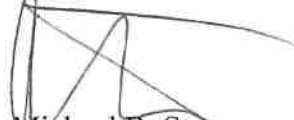
It is further requested that the Court accept the parties' Joint Letter dated August 16, 2024 and the proposed Civil Case Management Plan and Scheduling Order which were filed today one day beyond the initial deadline established by the Court.

This is Flintlock's first request for an adjournment of the Initial Pretrial Conference.

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Hon. Jennifer L. Rochon, U.S.D.J.  
August 20, 2024  
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Respectfully yours,



Michael R. Strauss

cc: All counsel of record via ECF